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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

**Reorganized
Debtors.**

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Reorganized Debtors

** All papers shall be filed in the Lead Case, No.
19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

District Court Case No. 22-cv-00389-HSG

**APPELLEES' (I) RESPONSE TO SPIRO
JANNINGS' APPELLANT'S
DESIGNATION OF RECORD AND
STATEMENT OF ISSUES AND
(II) DESIGNATION OF ADDITIONAL
ITEMS TO BE INCLUDED IN THE
RECORD ON APPEAL**

PG&E Corporation and Pacific Gas and Electric Company (collectively, the “**Appellees**,” the “**Debtors**,” or as reorganized pursuant to the *Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated June 19, 2020* [Dkt. No. 8048] (as it may be amended, modified, or supplemented and together with any exhibits or schedules thereto), the “**Reorganized Debtors**”) submit this response to the May 12, 2023, filing by Spiro Jannings (“**Appellant**”) of the *Appellant’s Designation of Record and Statement of Issues on Appeal from Bankruptcy Court* [Dkt. No. 13728], and designation of additional items to be included in the record on appeal, in connection with Appellant’s appeal from the *Order Denying Motion for Reconsideration by Spiro Jannings*, entered on March 27, 2023 [Dkt. No. 13646], by the United States Bankruptcy Court for the Northern District of California (the “**Bankruptcy Court**”).

I. RESPONSE TO STATEMENT OF ISSUES ON APPEAL

The sole issue on appeal is whether the Bankruptcy Court abused its discretion in denying Appellant’s motion for reconsideration of the order disallowing his claim, as failing to meet the standard of Rule 60(b)(3) and untimely filed under Rule 60(c) of the Federal Rules of Civil Procedure, as adopted by Federal Rule of Bankruptcy Procedure (“**FRBP**”) 9024.

II. DESIGNATION OF ADDITIONAL ITEMS TO BE INCLUDED IN RECORD ON APPEAL

Pursuant to FRBP 8009, the Reorganized Debtors hereby designate the following additional items to be included in the record on appeal, which include all exhibits and addenda attached thereto and filed therewith and all documents incorporated by reference therein:

Docket items from *In re PG&E Corp., et al.*, Case No. 19-30088 (DM):

Dkt. No.	Description	Date
263	Amended Declaration of Jason P. Wells in Support of First Day Motions and Related Relief	02/01/2019
8048	Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated June 19, 2020	06/19/2020
8053	Order Confirming Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated June 19, 2020	06/20/2020

Dkt. No.	Description	Date
10494	Order Further Extending Deadline for the Reorganized Debtors to Object to Claims and Granting Related Relief	04/05/2021
11392	Request for Judicial Notice in Support of Reorganized Debtors' Objection to Claim (Claim No. 58462, Filed October 17, 2019, of Spiro Jannings)	10/08/2021
11417	Certificate of Service of Sonia Akter	10/13/2021
11488	Notice of Continued Hearing on Reorganized Debtors' Objection to Claim (Claim No. 58462, Filed October 17, 2019, of Spiro Jannings)	10/26/2021
11838	Certificate of Service of Sonia Akter	01/20/2022
11853	Certificate of Service of Alain B. Francoeur	01/21/2022
11854	Certificate of Service of Sonia Akter	01/21/2022
11916	Certificate of Service of Xavi Flores	02/10/2022
11959	Certificate of Service of Alain B. Francoeur	02/21/2022
11969	Reply in Support of Motion for Relief From Order (Default Order; Dkt #11829; Sustaining Objection to Claim No. 58462; Dkt # 11388)	02/23/2022
12040	Certificate of Service of Sonia Akter	03/18/2022
13457	Notice of Deficiency	01/17/2023
13459	Certificate of Service of Dan Carney	01/17/2023
13464	Relief From Stay Cover Sheet	01/20/2023
13653	Certificate of Service of Alain B. Francoeur	04/01/2023
13664	Transmittal of Notice of Appeal to District Court	04/10/2023
13676	Certificate of Service of Victor Wong	04/20/2023
13683	Appellant's Motion for Expansion of Time	04/26/2023
13694	Service of Notice of Failure to Perfect Appeal	05/04/2023

Dkt. No.	Description	Date
13726	Appellant's Motion for Leave to Expand Time for Designation of Record and Statement of Issues on Appeal from Bankruptcy Court	05/12/2023
13727	Appellant's Declaration in Support of Motion for Leave to Expand Time for Designation of Record and Statement of Issues on Appeal from Bankruptcy Court	05/12/2023
13728	Appellant's Designation of Record and Statement of Issues on Appeal from Bankruptcy Court	05/12/2023
13729	Certificate of Mailing of Dan Carney	05/12/2023
13733	Order Granting Appellant Spiro Jannings' Motion for Leave to Expand Time	05/15/2023

Docket Text from *In re PG&E Corp., et al.*, Case No. 19-30088 (DM):

Dkt. No.	Description	Date
N/A	DOCKET TEXT ORDER (no separate order issued:) Denied The Motion to Extend Time filed by Spiro Jennings (#11768) is DENIED for the reasons stated by Debtors (#11775). The Motion to Abstain that Mr. Jennings filed (#11753) was not even set for hearing; the Objection to his claim was filed nearly three months ago. The Objection will remain on the January 18, 2022, calendar unless Debtors agree to continue it. (RE: related document(s) 11768 Motion to Extend Time filed by Creditor Spiro Jannings). (Montali, Dennis)	12/31/2021
N/A	DOCKET TEXT ORDER (no separate order issued:) The Motion For Relief From Order (Dkt 11871), filed by Spiro Jannings, and set on the March 2, 2022, 10:00 AM calendar, is DROPPED from the calendar. The court does not further argument, and the matter will stand as SUBMITTED on the papers. (RE: related document(s) 11871 Motion Miscellaneous Relief filed by Creditor Spiro Jannings). (Montali, Dennis)	02/28/2022
N/A	Hearing Dropped. The hearing on 3/2/22 regarding Motion for Relief from Order (Default Order Dkt #11829; Sustaining Objection to Claim No. 58462) is dropped from the calendar pursuant to the Court's 2/28 Docket Text Order. (related document(s): 11871 Motion Miscellaneous Relief filed by Spiro Jannings) (lp)	03/01/2022

Hearing Transcripts from in *In re PG&E Corp., et al.*, Case No. 19-30088 (DM):

Dkt. No.	Description	Date
13591	March 7, 2023 Hearing Transcript	03/08/2023

Proof of Claim filed in *In re PG&E Corp., et al.*, Case No. 19-30088 (DM):

Claim No.	Claimant	Date
58462	Spiro Jannings	10/17/2019

The Reorganized Debtors reserve the right to designate additional items for inclusion in the record or restate the issues presented on appeal.

Dated: May 26, 2023

KELLER BENVENUTTI KIM LLP

By: /s/ Jane Kim
Jane Kim

*Attorneys for the Appellees (Debtors and
Reorganized Debtors)*